



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

JUN 17 1988

Dr. Paul Krueger  
BOC Group Inc.  
100 Mountain Avenue  
Murray Hill  
New Providence, NJ 07974

Re: Maryland Sand, Gravel and Stone  
Workplan for Additional Bedrock Wells

Dear Dr. Krueger:

EPA and the State of Maryland herein present our comments on the Work Plan for additional bedrock wells at Maryland Sand, Gravel and Stone, version 1, dated June 6, 1988, and presented at our meeting of June 10, 1988.

Well Location

The location of a bedrock well in the surface drainage area between wells D&M-07 and D&M-12 is satisfactory. We are concerned, however, that the second location, near SMW-10, will not produce. The position should be moved to the furthest north and east accessible point from the access "road" to the east of SMW-10 (see attached map). Being closer to the creek swale, there may be a larger probability that the well will be a good producer; it will still provide additional contouring information, etc.

Well Drilling and Construction

A senior geologist should be present to make the determination of when competent bedrock has been reached. Please provide the name and qualifications of the site geologist. The criteria (mechanical and visual) that will be used to make this determination needs to be provided.

Core Samples and Well Logging

EPA and the State of Maryland believe that it is important that we are able to characterize the bedrock and are able to accurately determine the depth of the saprolite-bedrock interface. We offer the FRPs the

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option of substituting borehole geophysical methods in place of coring. A suite of geophysical techniques will be needed in order to provide this characterization. We suggest:

- color video
- acoustic televiewer
- gamma-gamma or sonic log
- caliper log

#### Well Sampling and Analysis

If you choose to perform the hexavalent chrome test, the test used by our Annapolis Central Regional Laboratory is Method #307 B, 14th edition of Standard Methods, page 192.

#### Reporting

EPA and the State of Maryland need to be provided with data as soon as it is available. Thus, water levels, field pH, specific conductance, temperature and slug test results as well as a field trip report on the well installation should be sent upon return from the field. Laboratory data should be sent before it has undergone quality assurance review as well as after, and geophysical logs when received from the contractor.

#### EPA and State Involvement

EPA and the State of Maryland will be on site during field activities to oversee the work performed. The PRPs will notify EPA at least 10 days prior to the initiation of field activities.

#### Schedule

Throughout EPA's discussions with the PRPs concerning the installation of additional wells, EPA has emphasized the schedule requirements that must be met concerning the Record of Decision (see correspondence: Lydia Isaacs to Michael Dore, February 3, 1988; Christopher Corbett to Paul Krueger, March 1, 1988; Christopher Corbett to Paul Krueger, March 23, 1988). It was therefore disappointing to see the schedule proposed in the Work Plan allow 24 weeks from the date of agreement to EPA's receipt of the draft supplemental report. As you are aware, this schedule will not allow us to make the September 30, 1988, deadline for the ROD. It is our belief that, due to the extensive time allowed for negotiating this Work Plan, extra effort must be expended so that the schedule requirements can be met. The use of borehole geophysics instead of coring should streamline the schedule; other measures may be necessary, and should be employed to meet our target deadline.

EPA wishes to be in receipt of all the data generated under this Work Plan by September 8, 1988.

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Additional Data Needs

As outlined in this letter, there remain some additional data needs that must be provided. These are as follows:

- name and qualifications of site geologist
- geophysical techniques to be used
- schedule

Should the PRPs agree to perform the work following the Work Plan dated June 6, 1988, with the above modifications, EPA and the State of Maryland agree that work should proceed on contracting a driller while the modifications are made to the draft Work Plan. EPA should receive a written acceptance of this proposal no later than June 21, 1988, and a revised Work Plan no later than June 28, 1988.

Sincerely

*Sharon Feldstein*  
Sharon Feldstein  
Enforcement Project Manager  
DELMARVA/DC/WV CERCLA  
Remediation Enforcement Section

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